

EXHIBIT 12



Valerie Collins <valerie@towardsjustice.org>

Request to Stay | Advanced Care Staffing, LLC v. Benzor Vidal, 01-22-0002-9008

David Seligman <david@towardsjustice.org>

Mon, Sep 19, 2022 at 8:32 AM

To: AAA Michele Gomez <MicheleGomez@adr.org>, sasaad@fordharrison.com, Juno Turner <juno@towardsjustice.org>, Valerie Collins <valerie@towardsjustice.org>, Hugh Baran <Hugh@kakaleclaw.com>, "Prakash, Anna" <aprakash@nka.com>

Dear AAA,

We are counsel for Mr. Vidal in the attached declaratory judgment action in United States Federal Court for the Eastern District of New York. Our client is the respondent in *Advanced Care Staffing, LLC v. Benzor Vidal*, 01-22-0002-9008, before your organization. We do not represent Mr. Vidal in that arbitration.

We are writing to request that AAA stay the arbitration pending the federal court's resolution of the declaratory judgment action.

We also refer you to the AAA's [moratorium](#) on debt collection arbitrations. The same concerns that spurred regulator interest in consumer debt collection arbitrations, ultimately causing your organization to cease conducting those arbitrations, apply with equal if not greater force in this context. Here, the petitioner seeks to collect a debt purportedly owed because the respondent, an immigrant worker, terminated his employment due to allegedly poor working conditions.

Best,

David

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1, Vidal, Complaint, 9-16-22.pdf

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